

REMARKS

Claims 1, 3-20 and 22-23 are pending in the case. The Examiner's reconsideration of the rejections is respectfully requested in view of the remarks.

Claims 1, 3-6, 8-20 and 22 have been rejected under 35 USC 103(a) as being unpatentable over Liou et al. (U.S. Patent Application No. 2002/0059395) in view of Leshem et al. (US 6,470,383). The Examiner stated essentially that the combined teachings of Liou and Leshem teach or suggest all the limitations of Claims 1, 3-6, 8-20 and 22.

Claim 1 claims, *inter alia*, "displaying a graphic link having a first end point at the element of the first perspective and a second end point at at least one element of a second perspective and representing an association between the element of the first perspective and the at least one element of a second perspective." Claim 12 claims, "representing the aspect in an activity map including at least two perspectives of the aspect; representing an activity of a user within the environment, wherein the activity corresponds to the aspect and is represented in each perspective simultaneously; and representing the activity of the user as a line rendered between each perspective of the aspect." Claim 19 claims, *inter alia*, "displaying at least one different aspect of user activity in each of at least two perspectives of an activity map, wherein the perspectives are associated by the user activity of a market participant, wherein an association between perspectives is represented as a tangible link connecting perspectives, wherein the tangible link is a line having ends points at aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map."

Referring to Claim 1: Liou teaches a method for providing a user interface for product exploration and product configuration (see Abstract). Liou does not teach “displaying a graphic link having a first end point at the element of the first perspective and a second end point at at least one element of a second perspective and representing an association between the element of the first perspective and the at least one element of a second perspective” as claimed in Claim 1. Liou merely teaches tabs for switching between views of product information, wherein the view are “unique and independent” (see paragraph [0035]). The user interface and tabs of Liou fail to display two perspectives, much less a graphic link connecting the element of the first perspective and at least one element of a second perspective, essentially as claimed in Claim 1. Therefore, Liou fails to teach all the limitations of Claim 1.

Leshem teaches a navigational aid of an Astra graphical user interface (see FIG. 5). Leshem does not teach or suggest “displaying a graphic link having a first end point at the element of the first perspective and a second end point at at least one element of a second perspective and representing an association between the element of the first perspective and the at least one element of a second perspective” as claimed in Claim 1. Leshem’s display of the navigational aid is clearly from a single perspective - that of a map of websites, websites connected by links (e.g., hyperlinks) (see col. 8, lines 37-42, col. 13, lines 6-10 and FIG. 1). While Leshem discloses modifying node and link display attributes at col. 30, lines 16-22 and FIG. 20, further investigation reveals that such modification refers to modifying attributes such as link color (see col. 29, lines 14-22). The Examiner’s argument apparently is that by adding information to a link, for example, by color, that the claimed limitation is suggested by way of adding a second perspective by way of the link itself, irrespective of whether the link connects

two end points within a single perspective. By merely modifying a link color, the link's end points do not change - that is, changing the color of a link within a single perspective of a website map does not connect two perspectives. Thus, Lesham's teachings are not analogous to "displaying a graphic link having a first end point at the element of the first perspective and a second end point at at least one element of a second perspective and representing an association between the element of the first perspective and the at least one element of a second perspective" as claimed in Claim 1. The website maps of Leshem show a single perspective, thus any links therein do not connect two perspectives. Therefore, Leshem fails to cure the deficiencies of Liou.

The combined teachings of Liou and Lesham fail to teach or suggest "displaying a graphic link having a first end point at the element of the first perspective and a second end point at at least one element of a second perspective and representing an association between the element of the first perspective and the at least one element of a second perspective" as claimed in Claim 1.

Referring to Claim 12: Liou teaches method for providing a user interface for product exploration and product configuration (see Abstract). Liou does not teach "representing the aspect in an activity map including at least two perspectives of the aspect; representing an activity of a user within the environment, wherein the activity corresponds to the aspect and is represented in each perspective simultaneously; and representing the activity of the user as a line rendered between each perspective of the aspect" as claimed in Claim 12. Liou teaches a literal view of product information (see for example, FIG 1). Liou's literal view of product information is not "an activity map including at least two perspectives of the aspect." For example, Liou teaches the use of tabs to switch between individual views - no more than one window

corresponding to a selected tab is displayed at any time. Further, the tabs clearly do not represent “the activity of the user as a line rendered between each perspective of the aspect” as claimed in Claim 12. Tabs reveal product information and are unrelated to displaying the activity of a user. Therefore, Liou fails to teach all the limitations of Claim 12.

Leshem teaches a navigational aid of an Astra graphical user interface (see FIG. 5). Leshem does not teach or suggest “representing the aspect in an activity map including at least two perspectives of the aspect; representing an activity of a user within the environment, wherein the activity corresponds to the aspect and is represented in each perspective simultaneously; and representing the activity of the user as a line rendered between each perspective of the aspect” as claimed in Claim 12. Leshem’s display of the navigational aid (a website map of links between URLs) is clearly from a single perspective - that of a map of websites (see col. 8, lines 37-42, col. 13, lines 6-10 and FIG. 1). Leshem’s link is rendered between URL’s of the same perspective, that of a map. Whether the link of Leshem can be considered a second perspective not relevant to the claimed limitation because the link itself is between two elements of the same perspective. Therefore, Leshem fails to cure the deficiencies of Liou.

The combined teachings of Liou and Leshem fail to teach or suggest “representing the activity of the user as a line rendered between each perspective of the aspect” as claimed in Claim 12.

Referring to Claim 19: Liou teaches method for providing a user interface for product exploration and product configuration (see Abstract). Liou does not teach “displaying at least one different aspect of user activity in each of at least two perspectives of an activity map, wherein the perspectives are associated by the user activity of a market participant, wherein an

association between perspectives is represented as a tangible link connecting perspectives, wherein the tangible link is a line having ends points at aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map” as claimed in Claim 19. Liou teaches a literal view of product information (see for example, FIG 1). Liou’s literal view of product information does not display a “tangible link is a line having ends points at aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map” as claimed in Claim 19. With respect to Claim 19, Liou is clearly deficient; Liou’s tabs are clearly irrelevant to a line between perspectives. Therefore, Liou fails to teach all the limitations of Claim 19.

Leshem teaches a navigational aid of an Astra graphical user interface (see FIG. 5). Leshem does not teach or suggest “displaying at least one different aspect of user activity in each of at least two perspectives of an activity map, wherein the perspectives are associated by the user activity of a market participant, wherein an association between perspectives is represented as a tangible link connecting perspectives, wherein the tangible link is a line having ends points at aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map” as claimed in Claim 19. Leshem’s display of the navigational aid is clearly from a single perspective - that of a map of websites, websites connected by links (e.g., hyperlinks) (see col. 8, lines 37-42, col. 13, lines 6-10 and FIG. 1). While Leshem discloses modifying node and link display attributes at col. 30, lines 16-22 and FIG. 20, further investigation reveals that such modification refers to modifying attributes such as link color (see col. 29, lines 14-22). As above, The Examiner’s argument apparently is that by adding information to a link, for example, by color, that the claimed limitation is suggested by way of adding a second perspective by way of the link itself, irrespective of whether the link

connects two end points within a single perspective. By modifying a link color, the link's end points do not change - that is, changing the color of a link within a single perspective of a website map does not connect two perspectives. Thus, Lesham's teachings are not analogous to displaying a tangible link as "a line having ends points at aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map" essentially as claimed in Claim 19. The website maps of Leshem show a single perspective, thus any links therein do not connect two perspectives. Therefore, Leshem fails to cure the deficiencies of Liou.

The combined teachings of Liou and Lesham fail to teach or suggest displaying a tangible link as "a line having ends points at aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map" essentially as claimed in Claim 19.

Claims 3-11 depend from Claim 1. Claims 13-18 depend from Claim 12. Claims 20 and 22 depend from Claim 19. The dependent claims are believed to be allowable for at least the reasons given for the respective independent claims. At least Claims 6 and 16 are believed to be allowable for additional reasons.

Claims 6 and 16 claim, *inter alia*, that "the at least two perspectives of the activity map are non-overlapping."

As described above, Liou fails to teach abstract graphical displays, much less two perspectives as abstract graphical displays (see Claim 1 and 12). Thus, Liou fails to teach that that "the at least two perspectives of the activity map are non-overlapping."

Lesham teaches a single map perspective having a link overlaid thereon, wherein the link may be modified according to some activity information between URL's on the map. Such an overlay is not analogous to the claimed non-overlapping perspectives of Claim 6 and 16.

Therefore, the combined teachings of Liou and Lesham fail to teach all the limitations of Claims 6 and 16.

The Examiner's reconsideration of the rejection is respectfully requested.

Claim 23 is believed to be allowable for at least the reasons given for Claims 6 and 16

For the forgoing reasons, the present application, including Claims 1, 3-6, 8-20 and 22-23, is believed to be in condition for allowance. The Examiner's early and favorable action is respectfully urged.

Respectfully submitted,

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/Nathaniel T. Wallace/
Nathaniel T. Wallace
Reg. No. 48,909
Attorney for Applicants

F. CHAU & ASSOCIATES, LLC
130 Woodbury Road
Woodbury, New York 11797
TEL: (516) 692-8888
FAX: (516) 692-8889